

Opposition Exhibit A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

United States of America,

Plaintiff,
vs.

Case No. 23-cr-20022
Hon. Gershwin A. Drain

D-1 Mohamad Kazkaz,
D-2 Ziad Khalel,

Defendants.

AFFIDAVIT OF GIORGIO BERTUCCI

NOW COMES Giorgio Bertucci of the Federal Bureau of Investigation, who being duly sworn, deposes and states:

1) My name is Giorgio Bertucci, and I am a Forensic Accountant with the Federal Bureau of Investigation, Detroit Division. I am over 18 years of age. I am fully competent to make this affidavit and I have personal knowledge of the facts stated in this affidavit.

2) To my knowledge, all of the facts stated in this affidavit are true and correct.

3) I have been employed with the Bureau since January 31, 2010. I am certified as a Public Accountant, with the State of Michigan. I am Certified as a Fraud Examiner by the Association of Certified Fraud Examiners, headquartered in Austin, Texas. During my career I was also employed as a Bank Investigator with the institution currently known as JPM Chase, for eight years, ending August of 2005.

4) I make this affidavit in support of the disposition of Chase Cashier's Check #9222731645, for \$1,445,000.00

5) According to the attached documentation obtained from JPM Chase, entitled "HOST ELECTRONIC JOURNAL TRANSACTIONS FOR 1/24/2023", Chase Cashier's Check for \$1,445,000 was deposited into account number *****0852. The documentation I reviewed identified the account as being titled to the entity currently known as National Restaurant Chain #1 in this litigation.

6) Based on the records currently available, the Government cannot verify

whether National Restaurant Chain #1 has indeed spent the \$1,445,000. The transaction records they offer do not appear to be drawn on the account ending in 0852 to which we have traced the funds thus far.

7) I signed this affidavit on April 10, 2023, in the Eastern District of Michigan.

Further, deponent says not.

/s/ Giorgio Bertucci

Giorgio Bertucci
Federal Bureau of Investigation